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9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DONALD WALDEN JR., NATHAN
13 ECHEVERRIA, AARON DICUS, BRENT
EVERIST, TRAVIS ZUFELT, TIMOTHY
14 RIDENOUR, and DANIEL TRACY on behalf
of themselves and all others similarly situated,

15 Plaintiffs,

16 vs.

17 THE STATE OF NEVADA, EX REL. ITS
18 NEVADA DEPARTMENT OF
CORRECTION, and DOES 1-50,

19 Defendants.

Case No. 3:14-cv-00320-MMD-WGC

**STIPULATION AND ORDER TO EXTEND
THE DEADLINE FOR (1) FILING
DISPOSITIVE MOTIONS AND (2) FILING
AN OPPOSITION BRIEF TO
PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT ON LIABILITY
FOR UNPAID WAGES UNDER THE FLSA
(SECOND REQUEST)**

20 Defendant, the State of Nevada, Ex. Rel. Its Nevada Department of Corrections ("NDOC"),
21 and Plaintiffs Donald Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt,
22 Timothy Ridenour, and Daniel Tracy, on behalf of themselves and all others similarly situated
23 ("Plaintiffs"), by and through their respective counsel of record, hereby stipulate and agree to extend
24 the dispositive motion deadline by one week, from April 1, 2020 to **April 8, 2020**.

25 The Parties further stipulate and agree to extend the deadline for responding to Plaintiffs'
26 Motion for Partial Summary Judgment on Liability for Unpaid Wages Under the FLSA [ECF No.
27 256] by one week, from March 30, 2020 to **April 6, 2020**.

28 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the

1 requested extension due to the challenges of working remotely due to the COVID-19 crisis,
2 including slower connectivity, communications delays, and obtaining records necessary to the
3 motions.

4 Accordingly, the parties agree that the requested extension furthers the interest of this
5 litigation and is not being requested in bad faith or to delay these proceedings unnecessarily.

6 This is the parties' second request for extension of this deadline.

7 DATED this 30th day of March, 2020.

8 **WILSON, ELSER, MOSKOWITZ,**
9 **EDELMAN & DICKER LLP**

10 */s/ James T. Tucker*

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Attorneys for Defendant

14 DATED this 30th day of March, 2020.

15 **THIERMAN BUCK LLP**

16 */s/ Leah L. Jones*

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18 Joshua D. Buck, Esq., Nevada Bar No. 12187
19 Leah L. Jones, Esq., Nevada Bar No. 13161
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Reno, Nevada 89511
Attorneys for Plaintiffs

20 **ORDER**

21 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

22 Dated this _____ day of _____, 2020.

23
24
25 **UNITED STATES DISTRICT JUDGE**